



**Jackson Lewis P.C.**  
44 South Broadway, 14<sup>th</sup> Floor  
White Plains NY 10601  
(914) 872-8060 Main  
(914) 946-1216 Fax  
[jacksonlewis.com](http://jacksonlewis.com)

*Via ECF*

November 5, 2021

Honorable John P. Cronan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re:** Rafael Almanzar v. Enterprise Gold Street Parking LLC, et al.  
Case No. 21-cv-06672

---

Dear Judge Cronan:

As counsel for Defendants Enterprise Gold Street Parking LLC (“Gold Street”) and World Tower Parking Garage, LLC (“World Tower”) (together, “Defendants”) in the above-referenced matter, we respectfully write jointly with Plaintiff to request an adjournment of the Initial Pretrial Conference currently scheduled for November 12, 2021 at 11 AM and a corresponding extension of associated deadlines for the initial conference-related submissions. The Parties have engaged in pre-discovery exchanges of documents and information and are currently working with the mediator assigned to this matter to schedule a mediation for early- to mid-December. Once the mediator has confirmed the mediation date, the Parties will notify the Court of such date and submit a Proposed Case Management Plan by December 27, 2021 if the matter is not resolved at mediation. The Parties do not anticipate needing another extension of time to submit a Proposed Case Management Plan or to attend an initial pretrial conference with the Court.

**JacksonLewis**

Honorable John P. Cronan  
November 5, 2021  
United States Southern District Court of New York  
Page 2

Thank you for Your Honor's attention to this matter.

Respectfully submitted,



Joseph DiPalma  
Brian A. Bodansky  
(914) 872-6882 Direct  
[Brian.Bodansky@jacksonlewis.com](mailto:Brian.Bodansky@jacksonlewis.com)  
Jackson Lewis P.C.  
4868-2241-0498, v. 1

These requests are granted. The Initial Pretrial Conference currently scheduled for November 12, 2021 is adjourned until January 3, 2022 at 11:30 a.m. By December 27, 2021, the parties shall file a proposed case management plan, scheduling order, and status letter.

SO ORDERED.  
Date: November 8, 2021  
New York, New York

  
JOHN P. CRONAN  
United States District Judge